



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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James Shaffer, Remedial Project Manager  
U.S. Department of the Navy  
Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway  
Code 1823-Mail Stop 82  
Lester, PA 19113-2090

RE: Comments on the Plan for Field Investigation for Former Derecktor Shipyard Still Water  
Basin, Naval Education and Training Center, Newport, Rhode Island

The Office has reviewed the Plan for Field Investigation at the Former Derecktor Shipyard.  
Attached are comments generated as a result of that review. If the Navy has any questions  
concerning the above, please contact this Office at (401) 277-2797.

Sincerely,

Paul Kulpa, Project Manager  
Division of Site Remediation

cc: Warren S. Angell, DEM DSR  
Richard Gottlieb, DEM DSR  
Christopher Deacutis, DEM DWS  
Robert Richardson, DEM DWR  
Kymberlee Keckler, USEPA  
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**Comments on the  
Plan for Field Investigation  
Former Derecktor Shipyard Still Water Basin**

**1. Section 2.1, Data Quality Objectives for Measurement of Data:  
Page 2-1.**

This section of the report discusses sampling of the outfalls. It appears that seven samples will be collected as part of this effort. Please indicate whether these samples are individual sample or composites, and how this sampling is best suited to suspected sources.

**2. Section 2.1, Data Quality Objectives for Measurement of Data:  
Page 2-1.**

This section the report states that TAL metals will be collected from the site. Please indicate whether said list will include tributyltin.

**3. Section 2.1, Data Quality Objectives for Measurement of Data:  
Page 2-2.**

This section of the report delineates the various bacteriological test to be performed at the site. Please note, these test may be unnecessary unless there is a suspected sewage source at the site.

**4. Section 3.1/3.2, Synthetic Media:  
Page 3-1.**

This section of the Plan discusses the synthetic media to be employed at the site. The Office recommends that algae growth measurements and chlorophyll A analysis be collected during the deployment of the synthetic media in order to access potential toxins to algae that could related directly to macroinvertebrate stress. This is task is easily accomplished as it only entails attaching a glass slide to the synthetic media.

**5. Section 3.1/3.2, Synthetic Media:  
Page 3-1.**

This section of the Plan indicates that the sampling disk will be suspended one meter above the bottom of the sediment. Placement of the sampling disk one meter above the bottom of the sediments may not represent exposure to sediment contaminates. Therefore, these disks should be placed in the sediment (note the Office would review any proposal to use rock baskets at the site in lieu of the disc

replicates).

**6. Section 3.1/3.2, Synthetic Media:  
Page 3-1.**

This section of the Plan discusses the sampling locations for the deployed disk. Although not stated it is assumed that all disk will be placed in water of equal depth (ie if the water in the Still Water Basin is an average of ten feet deep, accounting for tide, then the sampling depths for Station 25 and 26 should be approximately ten feet).

**7. Section 3.1/3.2, Synthetic Media:  
Page 3-1.**

This section of the report discusses the placement of the synthetic media. Although not stated it is assumed that said placement will occur after the remote sensing and photographic survey. This is necessary as it would optimize placement of the disk.

**8. Section 3.1/3.2, Synthetic Media:  
Page 3-1.**

This section of the report depicts the location of the reference stations. The locations chosen are in known areas of Naval activity and are probably contaminated. Therefore, these stations should not be designated as background sampling locations. The Office recommends collecting this type of sample from the Jamestown Cove reference station.

**9. Section 3.3.1, Analyze Deployment Data;  
Page 3-4.**

This section of the report delineates the various indices to be used at the site. Although not stated it is assumed that this analysis will include identification of known pollution intolerant and tolerant species. This identification should also depict the nature of the tolerance/intolerance (ie intolerant to solids contamination, chemical contamination, low dissolved oxygen, etc.).

**10. Section 3.3.1, Analyze Deployment Data;  
Page 3-4.**

This section of the report discusses the indices to be performed at the site. Please note if a reference sample is collected from the Jamestown station, the Still Water Basin stations should be compared to the Jamestown station.